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ABSTRACT

This report examines current assessment and eligibility practices relating to special education programs, and proposes changes to current policy and practice that will encourage and support a process that emphasizes determining student need, designing effective interventions, and evaluating outcomes. The paper views the emphasis in federal and state regulation on a categorical model of special education as a significant impediment to service delivery. The proposed approach eliminates the need to determine eligibility by category, and reflects a problem-solving process designed to address student needs within the instructional environment. The report identifies existing regulations which promote positive, comprehensive service delivery, and advocates creating an assessment and service delivery system that is driven by student needs, not categorical labels; linking both federal and state funding to supports and services rather than to categorical reporting; and supporting systematic experimentation to promote the design of comprehensive, needs-based models of service delivery. (Contains approximately 100 references.) (JDD)

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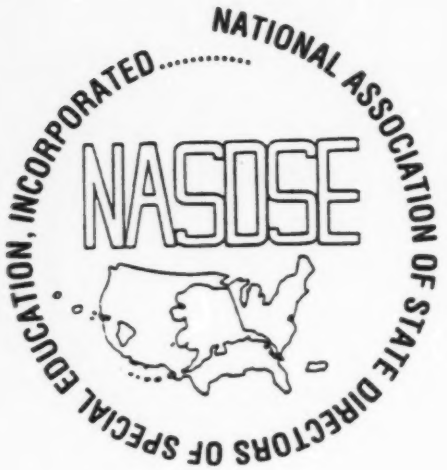
ASSESSMENT AND ELIGIBILITY IN SPECIAL EDUCATION:

AN EXAMINATION OF POLICY AND PRACTICE WITH PROPOSALS FOR CHANGE

By the National Association of School Psychologists

July 1994



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1800 Diagonal Road, Suite 320
Alexandria, VA 22314

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NASP WRITING TEAM

Andrea S. Canter

Deborah P. Crockett

Margaret M. Dawson

Janet Graden

Patti L. Harrison

Joseph F. Kovaleski

Daniel J. Reschly

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Richard L. Baldwin, Director,
Office of Special Education
Michigan Department of Education

Lorraine Costella, Assistant State Superintendent
Division of Instruction and Staff Development
Maryland Department of Education

Lucian Parshall, Consultant
Office of Special Education
Michigan Department of Education

Fred Smokoski, Director
Special Education Services Unit
Colorado Department of Education

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PREFACE

This synthesis on assessment and eligibility practices was commissioned by Project FORUM of the National Association of State Directors of Special Education, supported by a contract with the Office of Special Education Programs (OSEP). It was prepared by the National Association of School Psychologists (NASP), through the joint efforts of a writing team and reviewers selected from the leadership of the Association.

A re-examination of assessment and eligibility practices is long overdue. Those critiquing the current practice of assessing students to determine eligibility for special education programs include representatives from many constituencies: researchers, professional associations, advocacy groups, parents, and school-based practitioners, and school psychologists. Concerns about these assessment practices have also been raised in policy papers and forums sponsored by the Office of Special Education Programs and the Office of Special Education and Rehabilitative Services. For instance, the National Agenda Forum, sponsored by OSEP in January 1993, voiced support for an assessment process which focuses more directly on student needs and which establishes a stronger link between assessment and intervention. This re-conceptualization of the special education assessment process is compatible with concepts considered key to the general education restructuring movement, such as accountability and the increased emphasis on demonstrable student outcomes.

School psychologists play an integral role in the special education assessment process. The National Association of School Psychologists has a long history of advocating for assessment and intervention practices that are designed to improve educational and mental health outcomes for children and youth. Through a series of position statements beginning in the mid-1980's, NASP has stressed the need to provide appropriate services for all students under conditions that minimize the negative effects of stigmatizing labels and restrictive placements. As an outgrowth of these public statements, NASP established collaborative relationships with OSEP and other advocacy groups. Acknowledgement of the need to re-examine assessment and eligibility practices grew out of these discussions and led to the policy forum and, ultimately, to this report.

In May 1993, Project FORUM convened a forum to "Re-examine Policy and Practices in Current and Alternative Assessment and Eligibility Systems in Special Education." Participants were representatives of key stakeholder and professional groups, including advocates for children with disabilities, parents and teachers of students with disabilities, general and special educators, school psychologists, state directors of special education, an expert on special education and school law, and NASDSE and OSEP personnel. This document was commissioned in part as a result of issues discussed by the policy forum participants.

The purpose of this report is two-fold: 1) to examine current assessment and eligibility practices, and 2) to propose changes to current policy and practice that will encourage and support a process that emphasizes determining student need, designing effective interventions, and evaluating outcomes.

Project FORUM is pleased to have supported and facilitated the collaboration with NASP that produced this document. We hope it will support an informed discussion of the regulatory and policy changes needed to create an assessment process that goes far beyond eligibility issues alone—one that will focus on the needs of students and will lead directly to the design and evaluation of interventions to meet those needs.

EXECUTIVE SUMMARY

This document represents a collaborative effort between the National Association of School Psychologists and Project FORUM of the National Association of State Directors of Special Education. It provides a re-examination of the current practice of assessing students to determine eligibility for special education programs and proposes an alternative conceptualization of service delivery. The values and assumptions underlying the recommendations of this report include the following:

- All children can learn. Schools have a responsibility to provide a free and appropriate education for all children by maximizing instructional options within the general education system through a collaborative effort of all school professionals and parents.

- Psychoeducational needs of children should be identified through a multidimensional, non-biased assessment and decisionmaking process which addresses student needs in the context of the instructional environment rather than focusing on categorical labels.

- An improved service delivery system will not evolve through the mere substitution of one form of assessment for another, or through the replacement of one set of eligibility criteria for another.

The passage of the *Education of the Handicapped Act* (now the *Individuals With Disabilities Education Act* referred to as IDEA) was a significant milestone in American education, ensuring that all children receive an appropriate public education within the Least Restrictive Environment. Specifically related to assessment, this law supported comprehensive and outcome-oriented practices, including:

- use of tests and other evaluation methods tailored to assess educational need;
- use of nondiscriminatory materials and procedures;
- use of procedures which are validated for the assessment's purposes;
- integration of multiple methods and multiple sources of information;
- assessments by a multidisciplinary team of appropriately trained personnel; and
- review of progress to ensure effective programming.

In the sixteen years that IDEA has been in force, there have been significant gains toward safeguarding the rights of children with disabilities and their parents. However, shortcomings of policy and practice have also been identified by advocacy groups, policy forums, and researchers. A significant impediment to effective service delivery is the emphasis in federal and state regulation on a categorical model of special education which promotes assessment for eligibility determination and classification.

In place of a categorical model of service delivery, this paper proposes a process of decisionmaking through which the multidisciplinary team identifies children's educational needs,

determines strategies to meet those needs, implements intervention plans, and monitors progress toward individual goals. This conceptualization eliminates the need to determine eligibility by category, and reflects a problem-solving process designed to address student needs within the instructional environment as extensively described in special education and school psychology literatures.

This paper provides an analysis of policy and practice which highlights significant concerns with the current categorical model of special education. At the same time, it identifies and supports many existing regulations which promote positive, comprehensive service delivery. In conjunction with what is known about current practice, these positive features and existing assessment technologies provide a foundation for an improved system of decisionmaking. To this end, this paper advocates:

- Creating an assessment and service delivery system that is driven by student needs, not categorical labels.
- Linking both federal and state funding to supports and services rather than to categorical reporting.
- Supporting systematic experimentation to promote the design of comprehensive, needs-based models of service delivery.

ASSESSMENT AND ELIGIBILITY IN SPECIAL EDUCATION: AN EXAMINATION OF POLICY AND PRACTICE WITH PROPOSALS FOR CHANGE

INTRODUCTION

Overview

This paper presents an overview of the policy and practice issues regarding assessment and eligibility for students with disabilities and recommendations to improve these practices. Because of the complexity of the issues involved, it is necessary both to define terms and to lay out a set of guiding principles that form the foundation for the recommendations for needed change. Basic concepts and standards of assessment must also be understood. The Introduction provides this necessary background.

The second section examines current assessment, eligibility, and service delivery policy and practice, including a close examination of legal supports for and constraints on effective practice. The current emphasis on assessment to determine eligibility for special education services has created a system driven by the need to categorize children often at the expense of more effectively identifying student needs and linking them to services and interventions. Aspects of law and regulation that support good assessment practice will be summarized as will those aspects that impede effective practice.

The third section will provide recommendations for changes in policy and practice, including suggestions for revising regulations as well as a conceptualization of a service delivery system whose critical features incorporate prevention/early intervention, collaboration among education professionals and parents in a problem-solving format, and the development of responsive, adaptive programming to meet the diverse needs of all learners.

The final section will address how assessment fits within a larger context of school reform and restructuring. This discussion takes into account the complex nature of the change process, including the knowledge that change is best implemented when flexibility, experimentation, and local adaptation are integral to the process.

Guiding Principles

The values and assumptions that serve as the foundation for the discussion and recommendations offered in this paper include the following:

- **All** children can learn, and **all** children have a right to a free and appropriate education without having a categorical label. The education system must be designed to be responsive to the needs of **all** children, with and without disabilities.

As noted by the National Association of School Psychologists (1985a), "Necessary support services should be provided within general education, eliminating the need to classify children as handicapped in order to receive these services." In addition, efforts should be made to "serve children who have special needs without labeling them or removing them from regular education programs" (NASP, 1985b).

- **All** school professionals, in collaboration with parents, are essential to effective service delivery to students. In a system which emphasizes services to all children predominantly within a general education environment, the roles of professionals may change, but the demand for their services and expertise will not diminish.

Special education teachers, for example, may share teaching roles with general education teachers within regular classrooms; related services providers may collaborate with classroom teachers to incorporate specialized interventions in the classroom; school psychologists may spend more time designing and evaluating interventions and less time engaged in evaluation to determine categorical eligibility. A comprehensive service delivery system for all students will require that a full range of professional services be available in the school. In many cases improvements in current staffing levels may be required.

- The problems with the current system, for the most part, must be understood in light of **how the system is organized and regulated**.

The rights and protection of children with disabilities and their parents **must** be protected, while efforts are made to afford more options and services to all children.

- The improvement of referral, assessment, eligibility, and service delivery does **not** mean simply the replacement of "newer" methods for "traditional" methods.

Although there are well documented concerns with some current assessment methods (cf. Ysseldyke & Christenson, 1988), many problems with current assessment practices relate not only to methods but to the context and purpose for which methods are used. The existing concerns regarding assessment, eligibility, and service delivery are complex and not remedied by simple replacements. Improvement will require a commitment to a value that **all** children really means all children, not just those with disabilities or those without disabilities. Improvement will require a comprehensive, integrated service delivery system. Changing methods or practices without such a value or attention to the *comprehensive* nature of this model will **not** lead to improvements. For example, wholesale replacement of any "traditional" assessment method, such as a standardized test of intelligence, with an "innovative" practice such as curriculum-based assessment or authentic assessment will not work. A comprehensive model will incorporate many assessment

methods and will link method to the larger purposes of assessment. Likewise, replacing one form of special education eligibility with another e.g., moving from a categorical eligibility model to a non-categorical eligibility model, **does not ensure** that appropriate services will be delivered to all students in the least restrictive environment. Student *need* rather than arbitrary eligibility criteria must be the basis for delivery of supports and services.

Explanation of Terms

A number of terms used throughout this document are used in different ways by different individuals in different contexts. To ensure clarification for the reader, the list below explains how they are used within this paper.

- **assessment**: Assessment refers to the "process of collecting data for the purpose of (1) specifying and verifying problems, and (2) making decisions about students" (Salvia and Ysseldyke, 1991, p. 3). Although in practice, the terms "assessment" and "testing" are often used interchangeably, for the purposes of this paper, **testing** is defined as "exposing a person to a particular set of questions in order to obtain a score" (Salvia and Ysseldyke, 1991, p. 3). Thus, testing is viewed as just one component of assessment.

- **functional skills:** This refers to the wide variety of competencies needed to perform successfully in various environments. Functional skills include, for example, social skills needed within a school environment, academic skills needed to make purchases in the community, and domestic skills needed in the home.

- **interventions**: Interventions are a type of specific **supports** designed to meet specific needs of children. Interventions can include activities to increase children's competence and skills. They can also include environmental or instructional modifications designed to facilitate the acquisition of such skills. A classroom placement alone (e.g., special education) is *not* an intervention.

- **outcomes**: Outcomes are the result of interactions between individuals and schooling experiences (Ysseldyke, J.E., Thurlow, M.L., Bruininks, R.H., Gilman, C.J., Deno, S.L., McGrew, K.S. and Shriner, J.G., 1992, p. 8). Outcomes may refer to many domains including, for example, academic, social, behavioral, physical, vocational, health, and life-skill outcomes. Attaining positive outcomes may involve changing environmental characteristics or achieving a better match between student and environmental characteristics.

- **problem solving**: This is a systematic process that includes the assessment of children and their environments, identification of needs, development and implementation of supports to meet needs, and the monitoring and evaluation of outcomes. In this document, the use of the term "problem solving" does not imply that the focus is on problems or deficits

within children and belonging only to children. The focus is on children's needs, which may include needs for improved competence in children as well as for modifications in the learning environment.

- **services** and **service delivery**: In this paper, these terms primarily refer to assistance provided by professionals. They also refer to the manner in which assistance/**interventions** are organized school-wide or district-wide.

- **special education**: Special education is "specially designed instruction, at no cost to parents or guardians, to meet the unique needs of a child with a disability.." [20 U.CS.C. Chapter 33 §1401 (a)(16)]. Special education is not considered an intervention, nor is special education a place or teacher. It should be noted that many supports, services, and interventions to address students' needs are provided outside of a special education system.

- **students' needs**: This term is used in the broadest sense in this document. They could include students' needs for increased competence and skills in many domains, including academic, social, behavioral, community living, and other areas. They could also include the need for environmental or instructional modifications to promote academic, social and life skills attainment. This term also incorporates the need for educational services that are responsive to individual and cultural diversity.

- **supports**: Supports, too, are defined broadly to include any assistance which enables children to increase their competence and have their needs met. Supports include professional **services** and collaboration, environmental and instructional modifications and accommodations, **interventions**, adapted curriculum, physical assistance, social support, behavioral support, friendship facilitation, equipment, and materials.

PRINCIPLES OF ASSESSMENT

This section highlights important principles and standards that are fundamental to understanding effective assessment practices. The principles and standards are found in widely-accepted professional documents on assessment (e.g., American Psychological Association, American Research Association, and National Council on Measurement in Education, 1985; Joint Committee on Testing Practices, 1988) and are described in major assessment texts (e.g., Anastasi, 1988; Salvia & Ysseldyke, 1991; Sattler, 1988). The fundamental principles and standards include the purposes, methods, and major characteristics of assessment.

Purposes of Assessment

The purposes of assessment should drive the collection of information. Assessment may have many different purposes (Salvia & Ysseldyke, 1991):

- **referral** is a request for assistance from another professional, group of professionals, or agency. Assessment conducted for the purpose of referral would have the primary purpose of providing comprehensive and detailed information to inform the referral process;

- **screening** consists of the collection of preliminary information in order to determine if more comprehensive assessment is needed. Thus, the primary purpose is to gather sufficient information to make a more educated decision about the need for additional assessment data;

- **classification**, in the context of educational assessment, is the determination of eligibility for special services. The primary purpose of assessment for classification is to collect sufficient information to make a reliable decision regarding eligibility;

- **instructional planning** includes the development of specific goals, objectives, intervention strategies, and monitoring plans for students. The primary purpose of assessment for instructional planning is to collect sufficient, relevant and reliable data to assist intervention planning;

- **monitoring progress** consists of evaluation of the extent to which students are, or are not, meeting specific intervention goals and objectives. The primary purpose of assessment for this activity is to make informed decisions about intervention plans and their outcomes for students.

Methods of Assessment

A variety of assessment methods can be used in the data-gathering process. The following categorization includes not only traditional, commonly used procedures and tools,but also newer and innovative assessment approaches.

- **Tests and ratings** refer to any standardized instrument used for obtaining a sample of behavior, typically resulting in a score. Tests may include standardized, norm-referenced tests and standardized methods for collecting curriculum-based measurement, conducting portfolio assessments, or performance-based assessments. Ratings may include checklists and standardized rating forms completed by parents, teachers, or the students themselves.

- **Review of records** refers to any method of reviewing existing data sources or permanent products for pertinent information about concerns. These may include reviewing previous grades, previous assessment findings, attendance records, records of previous intervention outcomes and responses to services received, and examination of classroom and homework assignments.

- **Observation** refers to methods for systematically collecting data about behaviors (including academic, social, functional, etc.) in specific situations, settings, or environments by watching and recording events. Observations can focus not only on child performance and behavior, but on instructional supports and environmental contexts.

- **Interviewing** refers to using informants to collect perspectives concerning students' behaviors, situations, settings, and environments. Interviewing may occur from the perspective of those who know a child in various settings or the child him/herself. Parents, teachers, and children are key informants. Interviews can be structured and standardized or informal.

Characteristics of Comprehensive Assessment

A comprehensive assessment plan for a child integrates the purposes, methods, and characteristics of comprehensive assessment. IDEA specifically states that no single procedure can be used as the only criterion for determining a child's educational program, that assessment should be tailored to assess a child's education program, and that interpretation of assessment information must be based on information from a variety of sources [34 CFR 300.532]. Each purpose of assessment may result in the use of any or all of the assessment methods in order to collect sufficient information to address concerns. Thus, each assessment method may be applied with a number of different data sources, in many environments, across multiple domains, and across time.

Assessment is best conducted when multiple sources of information are considered. These include:

- **assessment with multiple data sources** (e.g., teachers, parents, students),
- **assessment in multiple environments** (e.g., classroom, home, and community),
- **assessment of multiple domains** (e.g., academic, social, behavioral, emotional, physical, vocational, health, developmental, life-skill), and
- **assessment across time** (e.g., to determine progress, monitor outcomes).

Continuous monitoring of progress toward desired outcomes is an important purpose of assessment within a problem-solving model. In order to monitor a student's progress, assessors could use all four assessment methods:

- **test/rating** (e.g., use curriculum-based assessment or a rating scale),
- **review of records** (e.g, record completion and accuracy rate of homework assignments across a period of several weeks as noted in the teacher's grade book),
- **observation** (e.g., record compliance to teacher requests based on classroom observation data),

- **interviewing** (e.g., collect information from teachers or parents over several months to assess the child's progress).

Standards for Assessment

There are well-accepted standards for assessment that provide an excellent foundation for judging assessment methods and guiding their use, including those methods considered innovative, such as authentic assessment, performance-based assessment, and portfolio assessment. These standards include the requirements for assessment found in the Individuals with Disabilities Education Act (1991), the *Standards for Educational and Psychological Tests* (American Psychological Association, American Educational Research Association, and National Council on Measurement in Education, 1985), the *Code of Fair Testing Practices in Education* (Joint Committee on Testing Practices, 1988), and the standards for practice proposed by the National Research Council (Heller, Holtzman, & Messick, 1982). These standards provide comprehensive tools for scrutinizing current and future assessment practices. Existing standards address concepts of technical adequacy of all assessment methods and procedures, including reliability, validity, and appropriateness of norms. **All** standards emphasize that assessment methods must demonstrate technical adequacy related to the **purpose** for which they are used.

Role of the School Psychologist in the Assessment Process

A critical role of school psychologists is that of assessment experts within a problem-solving model. The National Association of School Psychologists, in an April 1993 position statement, "School Psychologists: Assessment Experts for Restructured Schools," described the following characteristics which make school psychologists critical to the assessment process:

- "School psychologists have long been recognized for their expertise in developing, conducting, and interpreting individual and program assessment procedures."
- "School psychologists are specifically trained in psychometric theory, assessment procedures, and the applications of assessment data to educational decisions."
- "School psychologists promote the use of technically adequate assessment tools which are directly linked to instruction and intervention."

In addition to a role as assessment experts, school psychologists have training in human development, psychological and learning processes, instructional methodologies, and systems theory as it applies to school cultures. Furthermore, they have expertise in planning, implementing, and evaluating psychological and educational interventions for children. School

psychologists, with their training in collaboration and consultation with parents and other professionals, are invaluable resources to collaborative problem-solving teams in schools.

AN EXAMINATION OF CURRENT POLICY AND PRACTICE

It is important to recognize that current practices in assessment, eligibility, and special education service delivery are shaped by multiple influences. These include federal legislation and regulation, state legislation and rules, professional standards, the current state of knowledge and technology, individual decisions made by practitioners, community values, availability of resources and funding, training of personnel, parental involvement in educational programs, and numerous other influences.

Legal provisions exert enormous influence on service delivery and assessment and eligibility practices. These exist in several forms. Federal legislation such as the *Individuals with Disabilities Education Act* (1991) and the accompanying regulations (34 CFR 300) establish requirements regarding eligibility, service delivery, assessment purposes, content, and processes. State legal requirements in the form of state statutes and administrative rules exert additional influences on these practices. These legal influences are further modified by court opinions and decisions in special education hearings, requirements imposed through monitoring, and the findings that result from complaint investigations by the Office of Civil Rights.

The response of states, local districts, and individual professionals to the legal requirements of special education service delivery reflect varying interpretations of federal legislation and regulation. In order to receive federal monies, states must comply with federal mandates; however, states are free to establish more specific rules to implement federal assessment provisions. For example, 13 categories of disability are listed in federal statute, with a definition for each category. States may adopt the federal disability terminology and conceptual definitions, *or* they may use some variation of the federal terminology and definitions as long as the intent of the federal statute is retained.

States also determine specific criteria for eligibility. An analysis by Project FORUM (Gonzalez & Ahearn, 1993) of state requirements for determining eligibility revealed that many states require additional, sometimes more expanded and specified, elements to the federal definitions and terminology. In many instances, implementation of recommendations will require changes at the state level, not only at the federal level. The purpose of this analysis of current policy and practice, however, is to examine needed changes at the federal level of regulation.

The current federal and state legal requirements regarding services delivery, assessment, and eligibility establish an essential foundation for practices that protect the rights of children and youth. They also contain sections that have served as constraints against more effective practices. Specific aspects of federal requirements will be referenced and examined throughout the analysis,

with reference to how they serve to enhance or restrict comprehensive and effective services delivery.

Components of Current Policy and Practice

The following requirements from the current federal regulations provide a strong foundation for improved services delivery, assessment, and eligibility. Continuation of these requirements is crucial to improving programs for children with disabilities. They also are applicable to a redesigned system that is responsive to the needs of all students, with and without disabilities.

1. One of the four basic purposes of IDEA is "to assess and ensure the effectiveness of efforts to educate those children." [34 CFR 300.1(d)].

2. "Testing and evaluation materials and procedures used for the purposes of evaluation and placement of children with disabilities must be selected and administered so not to be racially or culturally discriminatory." [34 CFR 300.530].

3. A "*full* and *individual* evaluation of the child's *educational* needs must be conducted" [34 CFR 300.531].

4. "Tests and other evaluation materials...must be administered in the child's native language or other mode of communication, unless it is clearly not feasible to do so" [34 CFR 300.532(a)].

5. "Tests and other evaluation materials...have been *validated* for the *specific purpose* for which they are used" [34 CFR 300.532(a)].

6. "Tests and other evaluation materials must be...administered by trained personnel" [34 CFR 300.532(a)].

7. "Tests and other evaluation materials include those tailored to assess specific areas of educational need and not merely those that are designed to provide a single general intelligence quotient." [34 CFR 300.532(b)].

8. "No single procedure is used as the sole criterion for determining an appropriate educational program for a child" [34 CFR 300.532(d)].

9. "The evaluation is made by a multidisciplinary team..." [34 CFR 300.53].

10. "In interpreting evaluation data and making decisions about placement ..... shall draw upon information from a variety of sources...." [34 CFR 300.533].

11. "...shall ensure that the IEP of each child with a disability is reviewed in accordance with §§300.340-300.350;" [34 CFR 300.534(a)].

12. "That an evaluation of the child ..... is conducted every three years or more frequently if conditions warrant..." [34 CFR 300.534(b)].

These regulations include key concepts that provide a strong foundation for comprehensive assessment practices linked to intervention such as educational need, nondiscriminatory assessment, validity for specific purpose, comprehensive, multimethod and multisource assessment, and review of progress to ensure effective programming. These key aspects of the regulations provide a basis of support for the recommendations in this paper. Many of the problems with current practice could be improved with closer adherence to the foundations of these regulations.

Although these aspects of the regulations are positive in their **intent**, many of the concerns expressed in the following paragraphs about the influence of federal legal requirements on assessment practices originate in **interpretation** as well as in implementation of the regulations. Much of what needs to be improved in the current system stems from not fully implementing the spirit and intent of the above provisions. For example, greater attention to progress regarding achievement of instructional objectives certainly is a component within the current regulatory framework related to Individual Educational Programs (see especially 34 CFR 300.346(a)(5); CFR 300.1). The fact that progress monitoring in current practice often is inadequate does not originate in regulations; rather, current practices often do not implement the existing regulations on progress monitoring.

Concerns with Current Policy and Practice

Federal law and regulations have effectively established critical features of comprehensive assessment practices. Furthermore, these laws and regulations have gone far toward safeguarding the rights of children with disabilities and their parents. In other areas, however, federal legislation has fallen short of its goals. Advocacy groups, policy analysis forums, and research have converged to identify aspects of current policy and practice that impede the effective delivery of services to children.

Many of these concerns with current practice derive from the use of disability categories as a means of determining eligibility for services. One of the intended functions of a categorical eligibility model is to regulate how services are provided so that services and resources are directed at those who are most in need of them and to prevent abuses. However, requiring students to meet often arbitrary disability criteria has led to unintended outcomes that have had a negative impact both on how assessment is conducted and how services are delivered to children in need of them.

The use of a categorical eligibility model for determining access to services has lead to the following concerns: (These concerns have been discussed in great detail in other major works. Some of the primary sources for discussion of these concerns include Ahearn, 1993; Graden, Zins, Curtis, and Cobb, 1988; Reschly, 1988; Reynolds and Lakin, 1987; Will, 1986; and Ysseldyke, Algozzine, and Thurlow, 1992.)

- Because current assessment practices are driven to a large extent by categorical eligibility, professionals must use assessment measures that demonstrate eligibility according to state criteria. Unfortunately, much of what is required to determine categorical eligibility does not relate directly to areas of student competence, nor does it provide information that is useful for developing appropriate interventions and supports.

- Categorical eligibility requirements lead to an emphasis in assessment on child-related deficits, often restricting a more thorough examination of the environmental contexts that influence learning. All too often lacking in this model is an analysis of environmental supports that enable individuals to achieve and demonstrate competence.

- The conception of disability within the individual presents a significant problem for identifying students, particularly students of color, as disabled. Many educators and parents see this student-deficit conception of disability as reinforcing negative stereotypes and supporting racist interpretations of group differences.

- The categorical eligibility framework restricts assessment to demonstrating eligibility *at a specific point in time*. Because of the necessity of making a yes/no decision regarding eligibility, assessment is not used to measure performance over time or improvement on desired outcomes.

- Current federal regulations stipulate that assessment methods be demonstrably reliable and valid for the purpose for which they are used. A significant concern is that many measures used to determine categorical eligibility have not been demonstrated to be reliable and valid for that purpose. This concern is particularly relevant for students who are racially, culturally, or ethnically diverse. Educators and parents have emphasized that many tests lack reliability and validity for determining eligibility for minority children.

- Categorical differentiation has not been shown to be reliable for many categories of disability. The lack of reliability is of concern because the disability is presumed to be internal to the student. While it may have made sense when EHA was crafted in 1975 to assume that a categorical framework would be a useful way to organize services, research and practice have shown that building a service delivery system around this framework creates significant problems.

Specific concerns with the current service delivery system of special and general education include the following:

- Eligibility requirements not only determine how students are assessed, they also influence whether students receive services and supports, and how these services and supports are delivered. This has created a dual system of special and general education in which special educators have become responsible for educating children with disabilities while general educators are responsible for students without disabilities. This has resulted in limited and disjointed services to **all** students. Many students who may have very significant academic and behavioral needs do not receive support because they do not meet categorical requirements. In addition, there is less responsibility and ownership by **all** educators for **all** children.

- Federal funding of special education that is provided to state agencies is based on the number of students identified by existing law and regulations as having disabilities. Because current requirements determine eligibility according to a categorical framework, there are financial incentives for finding students eligible for services as disabled, but no financial incentives for supporting students within general education with necessary instructional options and supports. It is interesting, however, that the financial incentive at the federal level is relatively small. Although the federal funding formula under IDEA Part B provides for states to receive an allocation for each identified students with disabilities an amount up to 40% of the national average expenditure for all pupils, the federal contribution has never approached this figure (Parrish, 1993). In fact, over the past several years, federal funding has remained below 10%. Disability advocates have noted that federal mandates for students with disabilities have never been fully funded and supported. Despite the limited funding, funding practices have come to drive separated special education services and assessment and eligibility practices.

- There is variability in categorical eligibility from state to state, district to district, and school to school. The Annual Report by the Office of Special Education and Rehabilitation Services has demonstrated statewide inconsistencies each year, documented by research as well (e.g., Mercer, King-Sears, & Mercer, 1990; Patrick & Reschly, 1982; Wood & Grimes, 1988). This problem with inconsistencies regarding who is eligible for services and under what category likely reflects locally-determined need and availability of service. This is problematic when the service provided to students is not supposed to be based on the availability of support, but on the determination of a student-related categorical disability.

- Another form of inconsistency in categorical eligibility is the over-representation of certain racial and ethnic groups in some special education categories. This is of particular concern because the special education programming that students receive has not been demonstrated to be effective (*Larry P. v. Riles*, 1979, 1984, 1986, 1992; Reschly et al., 1988a, b).

- Differential categories have not been demonstrated to require different instructional methods. This concern is most relevant for educationally and socially determined

disabilities, since students with visual impairment or hearing impairment, among others, often have very specific educational needs that are directly related to their disability. This same relationship between a specific categorical disability and a specific instructional need has not been demonstrated for most other special education categories, however. Particularly for students with learning disabilities (LD), mild mental retardation (MMR), and serious emotional disturbance (SED), there is no documented evidence of instructional differences among various categorical programs (e.g., Epps & Tindal, 1987; Jenkins, Pious, & Peterson, 1988; Marston, 1989). There is now considerable and compelling evidence that similar educational needs exist for children in a variety of educational classifications including Chapter I, LD, SED, and MMR (Epps & Tindal, 1987; Jenkins et al., 1988; Kavale, 1980; Leinhardt, Bickel, & Pallay, 1982; Leinhardt & Bickel, 1987; Marston, 1987; Reynolds & Lakin, 1988; Shinn, Ysseldyke, Deno & Tindal, 1986; Ysseldyke et al., 1983). Although it may have been reasonable to assume that a categorical framework for services delivery would be educationally relevant, this assumption has not been supported by research.

- The categorical services delivery model restricts the time various professionals have to commit to other useful activities designed to meet students' needs. Time spent assessing for eligibility and re-evaluating eligibility and programming leaves professionals with less time to devote to prevention, early intervention, helping parents and teachers intervene and evaluate progress, and providing direct support.

RECOMMENDATIONS FOR CHANGE IN POLICY AND PRACTICE

Proposed Changes in Policy

The most problematic feature of current federal regulations for special education is the focus on categorical eligibility rather than on the child's educational, social, behavioral and functional needs. This focus on categorical disability in IDEA is understandable in view of the state of knowledge and technology when the law was formulated in the mid-1970s. Although there were concerns about the exceptional child classification system (Hobbs, 1975), it was still plausible to believe that the disability category would be closely related to educational needs. Furthermore, and most important, it was still tenable then that the disability category was associated with differential educational methodology. Indeed, it was believed that the programming would be, and needed to be, based on a careful determination of the child's specific disability. However, as described earlier in this document, these assumptions have not been confirmed. First, it is strongly recommended that the current categorical eligibility framework for special education be reexamined.

This proposal to re-examine the utility of the categorical eligibility framework has been offered by various researchers in special education (e.g., Reynolds and Lakin, 1987; Stainback and Stainback, 1984), and has also been made by professional groups such as NASP, the National Association of Social Workers, and the National Coalition of Advocates for Students (e.g., Advocacy for Appropriate Educational Services for All Children Position Statement, NASP, NASW, & NCAS; Rights Without Labels Position Statement, NASP, NASW, & NCAS).

The focus on categorical disability has had numerous implications for assessment policy and practice, particularly through the IDEA requirement that the child be "assessed in all areas related to the specific disability..." (34 CFR 300.532). Although this regulation may be intended to promote comprehensive assessment practices, unfortunately it also results in excessive attention to identifying and labeling the disability rather than identifying the child's educationally relevant needs. It also reinforces the conception of disability as a "within-child" problem, thereby making deficits in child performance a major component of assessment rather than supporting an assessment approach that addresses both student competence and skills as well as programming needs and accommodations. There is little benefit to be derived from "assessing the child in all areas related to the suspected disability" using traditional conceptions of disability. A second recommendation is to modify this particular assessment regulation to emphasize children's educational needs instead of disability. For example, the regulation could be re-worded to "The child is assessed in all areas related to presenting educational problem and specific educational needs."

A third, related recommendation is to remove the link between categorical eligibility and funding. This recommendation has been offered in many previous analyses of special education funding (e.g., Reynolds and Lakin, 1987; Stainback and Stainback, 1984). In addition, the recent position paper, "Winners All: A Call for Inclusive Schools" by the National Association of State Boards of Education supports this recommendation. Recently, a position taken by the National Association of School Psychologists addressed the link between funding and placement stating, "The link between funding and placements must be severed. Many aspects of the funding system are driven by labels and program locations rather than by student needs" (NASP, Inclusive Programs for Students with Disabilities Position Statement, 1993).

A final recommendation is to encourage systematic experimentation and flexibility within state education agencies and local education agencies to examine alternative ways for providing services.

Proposed Changes in Practice

As noted above, it is recommended that policies that dictate eligibility decisions based on category of disability be replaced. In its stead, assessment and service provision should be re-conceptualized as a **process** whereby children's needs are identified, strategies for meeting those

needs determined, plans are implemented, and progress toward goals are monitored over time. A problem-solving model becomes the vehicle that supports both the assessment process and service delivery.

Problem solving typically comprises four basic components: identification and specific delineation of the problem situation, analysis of various features related to the situation, development of specific intervention plans to address concerns, and evaluation of outcomes, with modifications as necessary.

A key component of a problem-solving model is collaboration among parents and professionals at every step in the process. Identification of concerns must be collaboratively developed, with an understanding of student performance in relevant contexts, including school, home, and community. Plans and strategies are also developed cooperatively, with consideration given to both student-related skills and behaviors as well as situational variables that might enhance performance. Both goals and strategies for achieving goals are developed collaboratively, and, ideally, responsibility for interventions is also shared among parents, teachers, and other professionals. Finally, evaluating outcomes and consideration of needed modifications are also group efforts.

There is an extensive literature base for collaborative problem solving both in the school psychology literature (cf. Brown, Pryzwansky, & Shulte, 1987; Conoley & Conoley, 1982; Gutkin & Curtis, 1990; Kratochwill & Bergen, 1990; Rosenfield, 1987; Zins, Curtis, Graden, & Ponti, 1988) and in the special education literature (c.f. Friend, 1988; Friend & Cook, 1992; Idol, Paolucci-Whitcomb, 1986; Idol & West, 1987). The school-wide framework for collaborative problem solving provides a foundation for teachers, parents, school psychologists, speech therapists, counselors, principals, and others to work together to focus on **immediate** problem solving and development of supports for all students in a building.

Recommendations for Effective Assessment

An effective assessment system includes the important notions of linking assessment to student needs, linking assessment to intervention, using assessment as a means of monitoring progress on outcomes, and encouraging greater participation and collaboration among parents and professionals during the assessment process. It is conceptualized as a data-driven **process** in which a wide range of traditional and innovative techniques are systematically selected to address comprehensively the particular needs of the individual. The proposed system is not only allowable under current rules and regulations, it is reflective of the original spirit and intent of the federal special education law.

A comprehensive assessment system should form one piece of the **collaborative problem-solving approach** described earlier in this paper. Assessment is most effective when it includes a systematic search for those supports, services, and interventions that will allow children to make

meaningful progress in their immediate and future environments. All methods of assessment, whether traditional or innovative techniques, are seen as tools with which assessment specialists construct hypotheses about causes of and solutions for problems experienced by the referred individual. These hypotheses are then verified by a systematic analysis of the student's responses to the assessment measures themselves and to the implemented interventions.

Assessment is incorporated into a collaborative problem solving model as follows:

- **Problem Identification/Definition**. Assessment begins as part of the initial identification and definition of the process. It may not be extensive in this phase but may include preliminary methods of gathering information to provide a description of the child's skills and performance and his/her environment. Assessment during this first step of problem solving may include, for example, review of school grades and other records, teacher ratings of classroom behavior and academic performance, review of work samples, systematic classroom observations, or interviews with parents or the child.

- **Problem Analysis**. Extensive assessment using various methodologies (observations, interviews, tests, and rating scales) occurs at this stage. Comprehensive information is systematically collected in order to generate and explore hypotheses about the child's characteristics, environmental factors, and interactions between the child and the environment. Assessment both identifies the child's current competencies and needs and defines environmental factors and the need for environmental modifications.

- **Development of Plans**. The assessment information collected during the previous phase is a significant component in the generation and implementation of plans. The team of professionals and parents that develops plans for the child pools assessment results and other information to identify the child's needs for supports, services, and interventions to describe outcomes expected as a result of these supports, services and interventions.

- **Monitoring Progress and Evaluating Outcomes**. Progress toward desired outcomes is monitored through ongoing assessment, and plans are modified in order to enhance progress. Assessment continues over time as supports, services, and interventions are evaluated for effectiveness. An important factor in monitoring progress and evaluating outcomes is the participation of all professionals working with the student as well as the student's parents and the student himself\herself.

This problem solving approach to assessment is different from current practice that typically includes a "test" to determine a student's disability category and/or eligibility for special education services. It is supported by a number of research initiatives across multiple literatures in education and psychology. Numerous studies have linked ongoing assessment procedures to the development of classroom interventions (e.g., Fuchs & Fuchs, 1986; Gickling & Thompson, 1985; Marston, 1989; Shapiro, 1989; Shapiro & Lentz, 1986). Studies have demonstrated convincingly that assessment data can be used to construct interventions. When the interventions

have been used in classroom settings, improved performance and gains in academic achievement have been documented (e.g., Fuchs & Fuchs, 1986). Authors of widely-used textbooks on assessment practices in school psychology, special education, and education (e.g., Anastasi, 1988 Kamphaus, 1993; Kaufman, 1979; Salvia & Ysseldyke, 1991 Sattler, 1988 Thorndike, Cunningham, Thorndike, & Hagen, 1991) support the need for a problem-solving, decisionmaking, hypothesis-generating approach to assessment. In a field application of this approach, Pennsylvania has developed an instructional assessment process in which (a) the student's skills are analyzed in relation to the expectations of the classroom, (b) the student's rate of acquisition and retention of classroom material is calculated, and (c) the type and quantity of instructional support needed to maintain meaningful progress is determined (Pennsylvania Regulations S 342.24).

The most important characteristics of assessment within a problem-solving model are as follows:

- **Students' natural environments are included as a setting of the assessment process.** A direct implication of assessment within a collaborative problem-solving model is the need to conduct assessment in all natural environments in which children participate. A number of critics of current assessment practices have questioned the validity of assessment results that do not include the collection of information in natural environments (e.g., Galagan, 1985; Marston, 1988, 1989; Reschly, 1989; Will, 1986). A growing literature has demonstrated that assessment of individuals in natural environments and authentic situations may provide useful information to aid in program development. Derr and Shapiro (1989) have demonstrated the utility of assessing academic skills in the regular classroom in actual curriculum tasks.

  Consideration of environmental contexts is relevant to all phases of problem solving. For example, in early phases of determining the variables affecting a problem situation, the environmental contexts in which the problems occur and how those contextual variables may be contributing to the problem situation are important (Shapiro, 1989). Discovering how a student's behavior varies across settings and is influenced by setting variables is necessary for the intervention planning process. Thus, assessment must focus on environmental demands and characteristics both to understand current behaviors and to plan for desired outcomes.

  Some research suggests that assessment of the natural environment may be a key to the design of effective interventions. For example, Ysseldyke and Christenson (1987; 1988 1993) have demonstrated how an assessment of critical classroom factors such as academic engaged time, teaching strategies, use of feedback, and contingencies for accuracy can assist assessment specialists in constructing meaningful strategies that have direct impact on instructional change.

- **Multiple procedures and methods are used in assessment**. Comprehensive assessment within a problem-solving framework must include multiple procedures, measures, perspectives, and sources of information. Current federal regulations require a multidisciplinary team for decision making. The intent behind this team is to incorporate multiple perspectives from multiple procedures and measures and not to base decisions on any one procedure, measure, perspective, or data source.

  Not only is the use of multiple procedures and performance measures in multiple settings required in regulation, it makes conceptual sense if the goal is to make well-informed decisions about needed supports, services, and interventions. Many of the limitations of current assessment practices may have arisen from under-utilization of the many existing valid and reliable methods to collect information about students and progress (cf. Deno, 1989; Marston, 1989; Shapiro, 1989). By integrating multiple methods, procedures, and perspectives into an assessment process, the problem-solving team has access to the range of information necessary to define problems, design strategies, implement plans, and monitor outcomes.

  Comprehensive assessment incorporates many types of assessment tools. For example, assessment may include administration of norm-referenced tests, completion of rating scales, administration of standardized performance-based measures, review of school and health records, systematic observation of behavior in the classroom, administration of curriculum-based measures, interviews with parents, teachers and the child, and many other tools for gathering information about the child and his/her environment. A comprehensive assessment requires careful consideration of each of the child's educational needs and a selection of the best tools to assess each need.

  In addition, comprehensive assessment must be idiographic or individually focused. The selection of the multiple procedures and methods to be used in assessment should be based on the unique characteristics and needs of each child and guided by specific questions that are related to the individual child and his/her environment. For example, a comprehensive assessment plan for Child A and Child B who are experiencing similar educational problems may include quite different methods and tools because of the different backgrounds and characteristics of the two children. Assessment must also address the unique requirements of different developmental periods. For example, assessment with infants, toddlers and preschool children will use a number of tools and techniques that aid in identifying and developing appropriate interventions for children in those age groups. Likewise, assessment with older adolescents and young adults will incorporate multiple tools and techniques designed to identify needs and develop plans for transition into life beyond school or into adult service provider systems.

  However, merely using multiple measures and procedures alone does not improve decisionmaking for children. As noted by Sattler (1988), "Different methods are likely to give additional information, but is the additional information necessary?...The nature of

the referral questions will help determine which specific assessment procedures should be used." (p. 5). Data-gathering efforts must be guided by a specific, problem-solving process with purposes for assessment clearly identified and data-gathering efforts systematically planned and linked to interventions.

- **The individual's culture, race, ethnicity, native language, and gender are respected**. Existing professional guidelines regarding appropriate assessment practices as well as components of federal regulations stipulate that all assessment procedures be valid for the individual's cultural, racial, ethnic and language background. When assessment is recognized as a process of making decisions, not merely a set of procedures, the concept of validity goes far beyond the tests being representative or being conducted in the primary language of the student. An appreciation of the diversity of the child and his/her relevant environments must pervade all phases of problem solving. Thus, assessment specialists should have a comprehensive knowledge of the student's cultural, racial, and ethnic backgrounds and should elicit information and perspectives from those who know the child best so that appropriate decisions can be made (Dana, 1993).

The assessment process proposed goes far beyond the scope of what is typically done to determine categorical eligibility for special education services. It will require specialists who are skilled in a wide variety of assessment techniques and methodologies and who have a firm understanding of how assessment becomes integrated into a collaborative problem-solving process. School psychologists, with their extensive training in a broad array of assessment approaches, are in unique position to fulfill this role. Furthermore, with their background and training in educational and social/behavioral interventions, they will be invaluable participants in a problem-solving process, an important component of which is to link assessment to intervention.

Recommendations for Effective Service Delivery

Just as collaborative problem solving shapes the assessment process, it serves as the linchpin of the service delivery system as well. In this way, it replaces categorical eligibility as the means for accessing the interventions, services and supports that are needed to ensure success for **all** children in our schools. Such a model can provide both a true continuum of services and a seamless system of support for all children.

Other professional groups, including those representing general education, have advocated for what they call unified schools (National Association of State Boards of Education, Council of Chief State School Officers). Advocates within special education (e.g., Gartner & Lipsky, 1987; Lipsky & Gartner, 1987; Stainback & Stainback, 1984; 1988) have described the features of a unified system of services for all children regardless of disability determination.

A comprehensive service delivery system includes as its key components **prevention and early intervention** support for all children and **responsive, adaptive programming** to meet the diverse needs of all children. Collaborative problem solving is the mechanism that brings services, supports, and interventions to all children in need.

Previous research on preventive problem solving used the term "pre-referral intervention" to describe the practice. Unfortunately, this term retains an emphasis on "referral" and seems to perpetuate a traditional view of eligibility. Pre-referral activities are too often viewed as hurdles to be overcome to get to the determination of categorical eligibility. The term collaborative problem solving more accurately reflects the description of what should occur in early intervention activities. This is based on the notion that students should not have to fail or demonstrate a significant deficit before they can receive support. Likewise, teachers and parents should not have to wait for significant concerns to arise before they can receive assistance through collaborative problem solving with other school professionals. Every student should be entitled to appropriate assistance and supports.

The problem-solving framework for comprehensive service delivery is relevant not only to prevention and early intervention but also guides the process of developing a responsive, individualized program of interventions, services, or supports for each child in need of such assistance. This is the case, whether the outcome is minor classroom modifications, cooperative teaching efforts between general and special education teachers, the provision of related services, or more intensive special education support such as community-based instruction. This framework, in which service provision is folded into an ongoing problem-solving process, also allows for functional assessment, continuous monitoring of student progress toward goals on Individual Education Plans, the evaluation of learning outcomes, and the assessments required to determine continued need for supports and services, as required in reevaluations.

A service delivery system based on this model is fundamentally different from the categorical, dual (special and general) education system currently in existence. It is a "seamless" system of collaboration, problem solving, and support to address the needs of all students in schools.

RELATED ISSUES

The changes we have proposed have many implications for and relationship to other issues that need to be addressed. This section addresses the most important of these issues.

First and foremost, these proposed changes and improvements in assessment and eligibility practices must be viewed within the larger context of educational change. Critical to this is an understanding of an effective change process that (1) encourages flexibility, local adaptation and systematic experimentation, and (2) promotes best practices through comprehensive training, education, and support for changes over a period of time (cf. Fullan, 1982; Hall & Hord, 1987).

Educational change is a process, not an event, and the mere replacement of existing rules and regulations with new language alone will not result in more effective practice. While it is important to examine what regulations can be mandated that will improve the likelihood that effective practices and programming will occur for **all** children, regulations alone cannot ensure this without attention to the multiple components of the complex change process.

Success is most likely when the process of change allows for flexibility, experimentation, and local adaptation within certain guiding principles, and many of the proponents of change in special education assessment and eligibility regulations have advocated for this. Flexibility within certain limits will allow school personnel and parents to design more responsive programs that meet local needs. Research on the change process has demonstrated that local adaptation is important for the implementation of lasting change (e.g., Hall & Hord, 1987). Furthermore, one criticism of current regulations is that by **not** allowing for flexibility and experimentation, school professionals have been restricted from exploring and implementing more effective practices for services that are more focused on outcomes.

In addition, change in any special education regulations must be considered within the larger context of educational restructuring within general education (cf, Skrtic, 1991; Stainback & Stainback, 1988). This principle has been the focus of restructuring recommendations of the Council of Chief State School Officers (CCSSO, 1992) and the National Association of State Boards of Education (Roach, 1992). Many states currently are involved in promising restructuring efforts with common themes of assessment related to outcomes and performance (e.g., portfolio assessment, performance-based assessment), increased focus on outcomes in general, increased local control (e.g., school-based decision making, site-based management), and restructuring schools to unify general and special education programming and, possibly, funding. All of these efforts are integrally related to the proposed changes in special education assessment and eligibility. Success of these changes for students with disabilities will be enhanced to the extent that they are linked to changes proposed within educational restructuring (e.g., Miller, 1990; Slavin, 1990).

For change in educational practices to be successful, the educational professionals involved in that change must have the skills necessary to implement the practices. Those who have questioned changes in special education such as we propose have expressed concern that general and special educators may not have the skills to respond to assessment and intervention needs of students with disabilities (e.g., Hallahan, Kauffman, Lloyd, & McKinney, 1988; Kauffman, Gerber, & Semmel, 1988). With respect to this concern, two points must be made.

First, concerns about the effectiveness and validity of assessment practices that focus on eligibility are long-standing. Thus, we are not departing into uncharted territory from proven effective practices (e.g., Algozzine, 1993). Rather, as has been discussed in this synthesis, there is an extensive research base supporting comprehensive assessment practices that link assessment to intervention. Efforts need to be redirected at comprehensive, on-going training methods, both preservice and inservice, to train general and special educators, assessment specialists and parents

to participate meaningfully and effectively in an assessment process within a comprehensive service delivery system. Funding for such training and support would be helpful and was a recommendation of the policy forum on assessment and eligibility. Forum participants noted that there currently are extensive monies available for training and development, and that it would be beneficial to coordinate training to lead to improvements in services. The experiences of both Pennsylvania and Iowa in their special education reform efforts have been exemplary in terms of training and support. In both of these states, comprehensive and systematic efforts have occurred state-wide to provide on-going training and technical support to personnel in local school districts. Both Pennsylvania and Iowa have accomplished this through local, regional and state-wide training supported at the state level.

Second, collaboration and communication among various professional groups and parents will be essential to facilitating changes in assessment and eligibility practices within a comprehensive, needs-based service delivery model. Many of the criticisms of current special education practices have focused on the lack of effective communication and collaboration between and among groups of educators, particularly special education and general education, as well as with parents of students with disabilities and parents of non-disabled children. Collaboration must be specifically planned for, both in facilitating an effective change process at local, state, and federal levels, and in implementing the proposed changes with respect to individual children.

In the change process, we recognize that there will be differing, and at times competing, perspectives on issues and concerns about change. Continued communication among groups will be essential to examine these perspectives and to reach consensus on practices that will improve services and outcomes for **all** students. Changes in assessment and eligibility practices can only be considered within a context of school restructuring. We advocate immediate examination of the issues discussed and proposals recommended in this synthesis.

CONCLUSIONS

The analysis of policy and practice in this paper was directed by four guiding principles. These are summarized as a basis for the recommendations.

- The educational service delivery system must be responsive to the needs of **all** children, those with disabilities as well as those without disabilities.

- All school professionals are essential within an improved service delivery system. Collaboration among all professionals and parents is key to a comprehensive services delivery system.

- Many of the concerns with the current service delivery practices originate from problems with the educational system and from existing regulations, including funding practices. Therefore, the system of service delivery must change.

- Improvements in service delivery is **not** a matter of a mere replacement of any "traditional "method of assessment, practice, or service delivery with a "newer" method. Comprehensive and integrated change is required, not simple or piecemeal solutions.

This analysis of policy and practice within service delivery, assessment, and eligibility, has highlighted significant concerns. For each of these concerns there are opportunities for improved policy and practice. At the same time, many of the existing regulations promote positive, comprehensive service delivery and must be retained. In conjunction with what is known about comprehensive assessment practices, these positive features and existing assessment frameworks provide a foundation for an improved, comprehensive service delivery system.

Nonetheless, some aspects of current regulations serve as barriers to more effective practices. This paper advocates the following:

- Creation of a service delivery system that is needs-based and support-based, not categorically driven.

- Linking both federal and state funding to supports and services rather than to categorical labeling and reporting.

- Support for systematic experimentation with comprehensive needs-based service delivery in state and local education agencies.

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